



DELTA STEWARDSHIP COUNCIL

A California State Agency

980 NINTH STREET, SUITE 1500
SACRAMENTO, CALIFORNIA 95814
HTTP://DELTACOUNCIL.CA.GOV
(916) 445-5511

January 15, 2016

Ms. Rhiannon Kucharski
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, CA 95814
rhiannon.l.kucharski@usace.army.mil

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Jessica R. Pearson

RE: Comments on Draft Central Valley Integrated Flood Management Study Watershed Plan

Dear Ms. Kucharski:

Thank you for the opportunity to comment on the Draft Central Valley Integrated Flood Management Study (CVIFMS) Watershed Plan. The Delta Stewardship Council (Council) appreciates the effort by the U.S. Army Corps of Engineers (USACE) to conduct this assessment of the Sacramento River Basin to identify key watershed issues; develop conceptual alternatives that integrate flood risk management, ecosystem restoration, and water supply goals to address these issues; and to help make findings of Federal interest.

The mission of the Council is to promote the coequal goals of water supply reliability and Delta ecosystem restoration in a manner that protects and enhances the unique values of the Delta as an evolving place (California Water Code section 85054). The Council has a legally enforceable management framework for the Delta and Suisun Marsh called the Delta Plan. The Delta Plan applies a common sense approach based on the best available science to restore habitat, increase the diversity and efficiency of California's water supplies, improve the Delta's risk management, and preserve the Delta's agricultural values. In many cases, the Delta Plan calls for projects in the Delta to provide multiple benefits, where feasible (e.g., increasing floodplains and riparian habitats while reducing flood risk). Since the proposed activities of the Draft CVIFMS will address Delta-related flood risk management and ecosystem restoration objectives, and the Federal Energy and Water Development Appropriations Act of 2012 states that the Federal policy on California's water supply and environmental issues related to the Delta should be consistent with the State's coequal goals, it is essential that both our agencies coordinate closely.

"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."

– CA Water Code §85054

Coordination with State Programs and Plans

The Draft CVIFMS includes planning goals of reducing flood risk to public safety and damage to property and critical infrastructure, restoring aquatic habitat and stream processes in the Sacramento River system, and increasing reliability and availability of water supplies for the watershed. We applaud USACE's effort to coordinate and align with State planning initiatives for the Sacramento Valley, particularly the 2012 Central Valley Flood Protection Plan and the Draft Central Valley Flood System Conservation Strategy, and for recognizing the importance of seeking opportunities to integrate habitat improvements and water conservation into flood risk management strategies. Additionally, we encourage USACE to coordinate and integrate with the State's other ongoing programs and planning efforts, including the Delta Plan, the California Department of Water Resources (DWR) Urban Flood Risk Reduction Program, the DWR Small Community Flood Risk Reduction Program, the DWR Delta Levees Program, and the California Water Action Plan.

Delta Levees Investment Strategy

The Delta Reform Act of 2009 called on the Council to lead a multi-agency effort, in consultation with the Central Valley Flood Protection Board, to establish and adopt, as a part of the Delta Plan, priorities for State investments in levee operation, maintenance and improvement for both project and non-project levees in the Delta (California Water Code section 85306). Currently, the Delta Plan includes interim priorities for State investment in Delta levees (Delta Plan Policy RR P1 [23 California Code of Regulations Section 5012]) and the Council now is engaged in updating these priorities through development of the Delta Levees Investment Strategy. As USACE further evaluates Federal interest in the Delta and makes progress on completing feasibility studies for the region (e.g., Sacramento River General Reevaluation Project), we encourage USACE to coordinate with Council staff to ensure collaboration amongst our agencies and identify a shared vision for flood risk reduction for the Delta.

Ecosystem Restoration

As described in the Draft CVIFMS, there are considerable net benefits that can be achieved when integrating habitat restoration with regional flood risk management strategies. In January 2016, Council staff will release a proposed final version of its report, *Improving Habitats along Delta Levees: A Review of Past Projects and Recommended Next Steps*, which assesses the effectiveness of different habitat improvement options associated with levee projects in the Delta and nearby upstream areas in benefitting native species (available at <http://bit.ly/IHaDL>). One of the findings of the report is that vegetated benches constructed along levee repair sites can provide habitat benefits for rearing salmon to naturally vegetated nearshore habitat. This finding was based on post-construction monitoring of the multitude of mid-2000's Delta emergency levee repairs implemented by USACE and DWR. As the USACE finalizes

the CVIFMS and begins progress on the associated off-shoot and spin-off studies, we recommend that USACE review this report to gain insights into effective approaches for integrating habitat features that benefit salmon and other native species into Delta levee projects.

Delta Plan Policies and Recommendations

The CVIFMS defines 50 opportunity areas as study regions and it also finds that there are several potential Federal interests in the Delta. We are pleased with these findings and we further recommend that any analysis within the Delta should consider the unique cultural, recreational, natural resource, and agricultural values of the Delta. The Delta Plan includes several relevant policies and recommendations for achieving the State's coequal goals in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place, which include:

- Use of best available science and develop adaptive management plans (Delta Plan Policy G P1);
- Prioritize habitat restoration within six priority habitat restoration areas (Delta Plan Recommendation ER R2);
- Expand floodplains and riparian habitats in levee projects (Delta Plan Policy ER P4);
- Respect local land use when siting water or flood facilities or restoring habitats (Delta Plan Policy DP P2);
- Plan for the vitality and preservation of legacy communities (Delta Plan Recommendation DP R3);
- Provide new and protect existing recreation opportunities (Delta Plan Recommendation DP R11); and
- Protect floodways (Delta Plan Policy RR P3) and floodplains (Delta Plan Policy RR P4).

During the future development of the CVIFMS and its subsequent activities (e.g., USACE San Joaquin River Watershed Study), Council staff can provide guidance as needed on how to align USACE's efforts with the Delta Plan.

Final Remarks

Council staff looks forward to continuing to work with USACE to explore and identify additional State-federal joint interests. Additionally, we would like to offer our support to USACE in further developing the proposed studies and activities described in the CVIFMS. If you have questions or would like to discuss the comments presented here, please feel free to contact my staff, You Chen (Tim) Chao (916-445-0143) at YouChen.Chao@deltacouncil.ca.gov or Daniel Huang (916-445-5339) at Daniel.Huang@deltacouncil.ca.gov.

Rhiannon Kucharski, U.S. Army Corps of Engineers, Sacramento
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Sincerely,

A handwritten signature in blue ink that reads "Cindy Messer". The signature is fluid and cursive, with the first name "Cindy" and last name "Messer" clearly legible.

Cindy Messer
Deputy Executive Officer
Delta Stewardship Council

cc Christopher Williams, California Department of Water Resources
Nancy Moricz, Central Valley Flood Protection Board